

IN THE United States District Court for
THE MIDDLE DISTRICT OF ALABAMA

Courtney Boyd
Plaintiff

2006 AUG 14 A 9:42

U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALA.

V.S.

2:06-CV-511-WKW

Dr. Darboze et al,

Motion To Compel pursuant to Rule 37(c) And
Motion For Preliminary Injunctions pursuant 65 F.R.
Civ. Proc.

Comes Now, the plaintiff, Courtney Boyd, move in to this Honorable Court for permission of the Court for the plaintiff to file this Motion pursuant to both Rule 37(c) and 65 F.R. Civ. Proc. The Plaintiff submit the following in support of this motion:

1. The plaintiff filed two motion for Production of Documents, one on July 26, 2006, and another on August 1, 06. This last Production of Documents this Court denied in part and Granted in part. See the Court order on August 4, 2006. However this Court did not rule on the plaintiff Motion filed on July 26, 2006.
2. The Defendant, Darboze, Wilson, Wambles, ~~have~~ not product the document that the plaintiff request for, and this is perjury to the plaintiff case. So the plaintiff request this honorable Court to Compel the Defendant to Product these documents within 10 days of receiving this motion.
3. The plaintiff this honorable Court to Compel the Defendant Whitehead, to product a copy of ~~that~~ his institutional file and medical file to this Court, so that it may be a part of his record for the hearing.

4. The Defendant, Dr. Darbouze, Zulson, Wambles and the other nurse and the 1st Shift Office Officer are trying to kill me, I am in lock up, because I reported this incident. See Exhibit A, which is a copy of this reported I filed to the Personnel Department.

5. The plaintiff request that the Defendant be Compel to answer the interrogatories and productions of documents filed on 8-26-06. Because if they don't then the plaintiff will not be able to file a answer to their special report due on 8-24-06. Also the plaintiff request that Officer McCain be Compel to answer the interrogatories filed on 8-1-06, so that the plaintiff will be able to answer defendant whitehead special report. Having the Defendant produce these documents and answer these interrogatories will not prejudice them in any way.

6. The Defendant forward a copy of the plaintiff institutional files and medical files to this court within 10 days of receiving this motion.

7. The plaintiff request for an temporary restraining order against Dr. Darbouze, Ms. Zulson, Ms. Wambles, nurse Bush, nurse Payne, nurse McDaniel, Officer C. Jones, Capt. K. Sconyers, Officer B. Gavin, for threatening the plaintiff life.

Wherefore, The plaintiff ask for the permission of this court, and ask that they grant this motion, and order the Defendant to produce the above, and for the restraining order be issued.

Certificate of Service

I hereby certify that I have served both counsel for the defendant, by placing it into Rasterling's cert. Mail box on 8-10-06

Courtney Boyd

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